

Exhibit 6

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: Methyl Tertiary Butyl
Ether ("MTBE") Products
Liability Litigation

Master File No.
1:00-1898

This Document Relates To:

City of Fresno
v. Chevron U.S.A. Inc., et al.,
Case No. 04 Civ. 4973

Case No.
MDL 1358(SAS)

DEPOSITION OF GAIL BLUE
March 18, 2011 at 1:00 (1:09) p.m.
Before: ERIC L. JOHNSON
RPR, CSR #9771

Taken at:
Fresno, California

1 just let me know.

2 A. I will.

3 Q. Okay. Are you under the influence of any
4 drugs, alcohol, or medications that may impact your
5 ability to testify today?

6 A. No.

7 Q. Do you have any questions about the deposition
8 process?

9 A. No.

10 Q. Okay. Did you review any documents in
11 preparation of the deposition today?

12 A. No.

13 Q. Did you meet with an attorney?

14 A. No.

15 Q. Are you represented by an attorney today?

16 A. No, not that I know of.

17 MR. STEEVES: I will hand you what's been
18 marked as Exhibit 1. It is a notice of deposition. On
19 the second page it says Subpoena to Testify and to
20 Produce Documents.

21 (Deposition Exhibit 1 marked for
22 identification)

23 MR. STEEVES: Q. Have you seen that before?

24 A. Isn't this what you sent me in the first letter
25 I got? Was this the one you sent me in the first

1 letter?

2 Q. Yes.

3 A. I believe so.

4 Q. Yes. Have you seen -- have you seen the
5 document?

6 A. Yes.

7 Q. If you turn to the third page, there is a page
8 marked Attachments. I am sorry, one more page.

9 A. Mm-hmm. Yes.

10 Q. And it lists documents, types of documents that
11 we are looking for.

12 A. Yes.

13 Q. Did you bring any documents with you today in
14 response to this?

15 A. No, I don't have any.

16 Q. Okay. And is it your understanding that you
17 are here today to talk about the Red Triangle Oil site
18 at 2809 South Chestnut in Fresno?

19 A. Yes.

20 Q. Can you tell me the date -- the dates you were
21 associated with that site?

22 A. Approximately 1980 to first -- January 2002, I
23 believe.

24 Q. And when you were first associated with the
25 site in 1980, did you have a title?

1 A. I collected money for Triangle stations.

2 Q. No formal job title?

3 A. Not really. Not then.

4 Q. And what did you do after that? Did you change
5 job duties at any point?

6 A. I worked in the warehouse for -- I don't know
7 how long, couple of years.

8 Q. When you -- when you say the warehouse, was
9 that on site at --

10 A. On site. Mm-hmm.

11 Q. You said a couple of years?

12 A. Mm-hmm.

13 Q. And then after that?

14 A. Then I went to the office.

15 Q. And what did you do in the office?

16 A. Gosh, I can't remember. Just answered phones
17 and typed and do just office work.

18 Q. And after the office, did you have any other
19 roles?

20 A. Yes. I was put in as CEO when everybody was
21 let go.

22 Q. Approximately what was the date that you became
23 CEO?

24 A. I do not remember.

25 Q. Do you remember a time frame? The '90s, the

1 '80s?

2 A. Oh, gee, I really don't. I can't tell you that
3 date.

4 Q. And you said when -- when everybody was let go.
5 What do you mean by that?

6 A. When my -- well, the people that were running
7 it was my brother, Joel Hohenshelt, and my ex-husband,
8 Glen Blue.

9 Q. And who let them go?

10 A. My father.

11 Q. What's your father's name?

12 A. Arnold Hohenshelt. He's deceased.

13 Q. And were you CEO until 2002 then?

14 A. Yes, I was.

15 Q. And what did you do to end your association
16 with the site in 2002?

17 A. We sold it to the Shehadeys.

18 Q. When you say you sold the site, did you sell
19 the -- the dirt or the business?

20 A. The business.

21 Q. The business.

22 And in 2002 what did the business consist of?
23 Was it just --

24 A. There was propane, diesel, gasoline, truck and
25 trailers, some service stations, or mini-marts actually.

1 Q. Were these all in the Fresno area?

2 A. No.

3 Q. What other areas did you have locations?

4 A. Kettleman, Kingsburg. I think that was it
5 outside of the area, I think. I can't remember.

6 Q. So at your time when the Red Oil -- Red
7 Triangle Oil from 1980 to 2002, was the business
8 headquartered at the location at 2809 South Chestnut?

9 A. Yes.

10 Q. Okay. Prior to 1980 what did you do?

11 A. I -- I worked for a doctor, Dr. Heckel.

12 Q. What did you do there?

13 A. I -- everything. Assisted in -- as an office
14 person. I also did back office work. I did -- took
15 care of patients, did EKGs, did a little of everything.

16 Q. And -- and prior to that?

17 A. I worked at Community Hospital as a PBX
18 operator. Prior to that I worked for the telephone
19 company as a PBX operator. That's it.

20 Q. And that's it? Do you have a formal education,
21 a college degree?

22 A. No, I have no college, but I did graduate from
23 high school.

24 Q. Do you have any specialized training,
25 professional licenses?

1 A. No.

2 Q. Have you ever worked for any other gas or
3 petroleum company other than Red Triangle Oil?

4 A. No.

5 Q. Do you recall -- well, strike that.

6 When you sold the business in 2002, you sold
7 the buildings, did you also sell the USTs?

8 A. Yes, they took everything.

9 Q. Okay. Do you know what MTBE is?

10 A. Yes, it's -- it is something that's put in
11 fuel. They say that it is -- at this time I guess it is
12 not supposed to be really good for you, but at the time
13 that they put it in there there was -- we were mandated
14 to put it in there by the State of California, so -- I
15 mean, we didn't put it in there, the companies did. And
16 we bought the fuel from -- from whomever we bought it
17 from.

18 Q. Who did you buy the fuel from?

19 A. Oh, we bought from everybody. We bought from
20 Exxon. At that time we were an Exxon dealer so, you
21 know, if we had an Exxon station, we put Exxon fuel in
22 the Exxon stations. But the stations that were
23 unbranded, we could put any fuel into, so we could pull
24 whatever fuel we want, you know, could get at a cheaper
25 price from the refinery. And so -- and -- and our

1 plant, because we sold to farmers. So --

2 Q. And the plant was at 2809 --

3 A. Yes.

4 Q. -- South Chestnut Avenue?

5 A. Yes.

6 Q. What other facilities were at that site? I
7 assume that's a bulk plant, correct?

8 A. It is a bulk plant.

9 Q. Yeah.

10 A. And the station out in front there. That
11 was -- where we sold fuel to vehicles.

12 Q. And so who did you buy -- which gas or
13 petroleum companies did you buy from at that site,
14 2809 South Chestnut?

15 MS. KLEAVER: Calls for speculation.

16 MR. STEEVES: Q. From the -- for the years
17 that you were present at the site.

18 A. Gee. Well, I know we bought from Exxon. I
19 don't think we ever bought from Chevron, that I am aware
20 of. I didn't buy -- purchase the fuel, okay? I had a
21 purchasing agent that did all the buying, Jack Allen,
22 and he's deceased.

23 Q. You say Allen?

24 A. Jack Allen, A-l-l-e-n.

25 Q. Thank you.

1 A. And I don't know all the people he bought from.
2 We -- you know, we bought from a lot of different
3 sources. I think we bought from Tesoro, Exxon. There
4 was another one. I am not sure about Atlantic or ARCO.
5 We might have bought some from ARCO. I am not really
6 sure. BP, I think we bought -- I think we bought some
7 from them. I am not aware that we ever bought anything
8 from Chevron. We bought Chevron products but not fuel.
9 The rest of them here I don't -- I don't really
10 recognize those names, but --

11 Q. Do you recall any time periods for when you
12 bought from those companies?

13 A. No, I don't.

14 Q. Okay. Do you recall who delivered the gasoline
15 to the site at 2809 South Chestnut?

16 A. We had our own truck and trailers.

17 Q. And do you know where they picked up from?

18 A. From the plant -- the place in Fresno out
19 there. I don't know even the address of it. But it was
20 a pipeline. It was a pipeline out not too far from us.

21 Q. You don't recall the name?

22 A. No.

23 Q. Do you recall if you had any agreements to buy
24 a particular brand of gasoline?

25 A. I think the only one we had was Exxon. But I

1 A. Oh, I don't think so. No, I don't believe they
2 did. I don't know what they did, to be honest with you.
3 I wasn't there when they inspected them. But they just
4 sent -- I don't know the name of it, what it would be,
5 but I know one guy's name was Jim. I don't even know
6 his last name, but that we were in contact a lot with
7 him, with Exxon. Now, this is just Exxon.

8 Q. So Jim worked for Exxon, as far as you can
9 recall?

10 A. Mm-hmm.

11 Q. And this was for the site at 2809 South
12 Chestnut?

13 A. But that has nothing to do with 2809, no.

14 Q. No, it doesn't?

15 A. No. No, because most of the time, that I know
16 of, I don't know that we put fuel from Exxon in there.
17 I don't know that. I know we bought fuel from Exxon,
18 but normally we put Exxon in Exxon stations, so --

19 Q. I think you testified that you bought Tesoro
20 gasoline for your station.

21 A. Yeah.

22 Q. Did you buy Tesoro gasoline for the station at
23 2809?

24 A. Probably we did. I can't tell you that,
25 either, because I don't know unless I saw the records

1 where it went. You know, I really don't know. It could
2 have been a truck and trailer load that went to a -- a
3 farmer.

4 Q. Did any gas company ever give you instructions
5 for responding to spills of gasoline with MTBE?

6 A. Not me, personally. I didn't have -- you know,
7 I didn't really deal in that part of it, like I said.

8 Q. Did you ever see any drips, leaks, or spills of
9 gasoline during deliveries at the station at 2809?

10 A. No, I never did. Personally, no.

11 Q. Is it fair to say that when a customer fills up
12 their car, a little bit of gasoline will drip from the
13 nozzle?

14 MR. PARSEGHIAN: Objection; asked and answered.

15 THE WITNESS: I don't know that. I am not
16 watching them.

17 MR. STEEVES: Q. So are you aware of your
18 practice of cleaning up any spills if they were to
19 occur.

20 A. The only --

21 MR. PARSEGHIAN: Objection; lacks foundation.

22 MR. STEEVES: Q. You can answer the question.

23 A. The only thing we ever had to, you know, clean
24 up, we put some stuff down was with diesel. And the
25 only thing that I ever knew that we had -- that somebody